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1/11/23 3:33 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Bankruptcy No. 22-21344-JAD
)	
Shawnee L. Fife,)	Chapter 13
)	
Debtor)	Related to ECF Nos.: 46, 48, 50
)	
Shawnee L. Fife,)	
)	Hearing: 02/01/2023 @ 11:00 AM
Movant)	
)	
v.)	
)	
Midland Credit Management, Inc.,)	
)	
Respondent)	

STIPULATION RESOLVING OBJECTION TO CLAIMS OF
MIDLAND CREDIT MANAGEMENT, INC. [CLAIMS NO. 4, 5 AND 6]

And now comes the Debtor, Shawnee L. Fife, by and through her counsel, Dennis M. Sloan and the law firm of Sloan & Associates, P.C. and Midland Credit Management, Inc. ("Midland"), by and through its counsel, Brian Nicholas Esquire and KML Law Group, P.C., and stipulate as follows:

WHEREAS, the Debtor filed a Chapter 13 Voluntary Petition on July 12, 2022 at the above-referenced case number; and,

WHEREAS, on July 19, 2022 Midland filed a proof of claim docketed at Claim No. 4 on the Claims Register for an unsecured claim in the amount of \$5,930.12 ("Claim 4"); and,

WHEREAS, on July 19, 2022 Midland filed a proof of claim docketed at Claim No. 5 on the Claims Register for an unsecured claim in the amount of \$5,560.85 ("Claim 5"); and,

WHEREAS, on July 19, 2022 Midland filed a proof of claim docketed at Claim No. 6 on the Claims Register for an unsecured claim in the amount of \$7,099.58; and,

WHEREAS, on December 19, 2022, at Docket Number 46 the Debtor filed an Objection to Claim 4 and Request for Attorney's Fees Pursuant to F.R.B.P. 3001(c)(2)(D)(ii); and,

WHEREAS, on December 19, 2022, at Docket Number 48 the Debtor filed an Objection to Claim 5 and Request for Attorney's Fees Pursuant to F.R.B.P. 3001(c)(2)(D)(ii); and,

WHEREAS, on December 19, 2022, at Docket Number 50 the Debtor filed an Objection to Claim 6 and Request for Attorney's Fees Pursuant to F.R.B.P. 3001(c)(2)(D)(ii); and,

WHEREAS, on December 30, 2022, Midland filed an Amended Claim 4, Amended Claim 5 and Amended Claim 6; and,

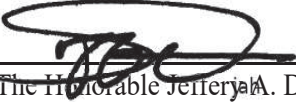
WHEREAS, without admitting fault or liability of any kind, the parties wish to resolve the Debtor's Objections to Claims 4, 5 and 6.

NOW THEREFORE, in consideration of the above-referenced premises, and intending to be legally bound hereby, the Debtor and Midland, by their respective counsel, stipulate and agree, subject to the approval of the Bankruptcy Court, as follows:

1. The Proofs of Claim filed by Midland on July 19, 2022 at Claims No. 4, 5 and 6 ("the Claims"), and amended on December 30, 2022, shall govern as to amount.
2. If the within bankruptcy case is converted to another chapter, dismissed or closed without a discharge, then the Claims shall not have a *res judicata* or collateral estoppel effect in the converted case or in any future bankruptcy filing or state court action.
3. The parties shall retain all claims and defenses in any converted case, future bankruptcy case or state court actions.
4. The parties shall bear their own costs related to this matter.

SO ORDERED:

Dated: January 11, 2023



The Honorable Jeffrey A. Deller, Judge
United States Bankruptcy Court

CONSENTED TO BY:

SHAWNEE L. FIFE

01/10/2023
DATE

BY/s/Dennis M. Sloan
Dennis M. Sloan
Pa ID. No. 83784
Sloan & Associates, P.C.
106 S. Main Street, Suite 305
Butler, PA 16001
(724) 284-9092
sloanassoc@zoominternet.net
Counsel for Debtor

MIDLAND CREDIT
MANAGEMENT, INC.

01/10/2023
DATE

BY /s/Brian Nicholas, Esquire
Brian Nicholas, Esquire
Pa ID. No. 317240
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(201) 549-5366
bnicholas@kmlawgroup.com
Counsel for Chapter 13 Trustee

In re:
Shawnee L. Fife
Debtor

Case No. 22-21344-JAD
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Jan 11, 2023

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 13, 2023:

Recip ID	Recipient Name and Address
db	+ Shawnee L. Fife, 4665 Edinburg Road, New Castle, PA 16102-2741

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 13, 2023

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 11, 2023 at the address(es) listed below:

Name	Email Address
Brian Nicholas	on behalf of Creditor Midland Credit Management Inc. bnicholas@kmlawgroup.com
Dennis M. Sloan	on behalf of Debtor Shawnee L. Fife sloanassoc@zoominternet.net dsloan@sloanassoc.com
Gary W. Darr	on behalf of Creditor First Commonwealth Bank gdarr@lenderlaw.com
Keri P. Ebeck	on behalf of Creditor LVNV Funding LLC kebeck@bernsteinlaw.com, jbluemle@bernsteinlaw.com
Office of the United States Trustee	ustpreion03.pi.ecf@usdoj.gov
Ronda J. Winnecour	cmecf@chapter13trusteewdpa.com

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User: auto

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Date Rcvd: Jan 11, 2023

Form ID: pdf900

Total Noticed: 1

TOTAL: 6